

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

WESTPORT INSURANCE CORPORATION,	)	
	)	
Plaintiff,	)	
vs.	)	Case No. 10 CV 2188 (RMB) (THK)
	)	
THE HAMILTON WHARTON GROUP, INC.,	)	
WALTER B. TAYLOR, individually,	)	
	)	
and	)	
	)	
INTER-COMMUNITY MEMORIAL	)	
HOSPITAL OF NEWFANE, INC., et al.,	)	
	)	
Defendants.	)	

**AFFIDAVIT OF KAREN THURLOW**

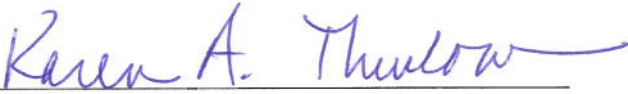
I, Karen A. Thurlow, state under penalty of perjury that the following facts are true and correct, based upon my personal knowledge thereof:

1. I am currently employed as a Vice President of Corporate Solutions for Swiss Re America Holding Corporation.
2. In my capacity as Vice President of Corporate Solutions for Swiss Re America Holding Corporation, I am the person responsible for handling the captioned declaratory judgment litigation on behalf of Westport Insurance Corporation.
3. Westport Insurance Corporation currently pays partners of its panel counsel who litigate in the Southern District of New York in the rate range of \$185 to \$225 per hour.
4. Counsel for Westport Insurance Corporation has billed just over 400 hours during the time period covered by Hamilton Wharton's fee petition (April 1, 2009 to the present).
5. Counsel for Westport Insurance Corporation in this declaratory judgment action consists of a team of seven timekeepers.

6. The highest billing associate on the Westport Insurance Corporation team for this declaratory judgment action has billed 138 hours over the eleven month period encompassed by Hamilton Wharton's fee petition.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: March 9, 2011

  
Karen A. Thurlow



